

Linda Wong, Esq.
WONG FLEMING, P.C.
821 Alexander Road, Suite 200
Princeton, New Jersey 08543
Tel: (609) 951-9520
Fax: (609) 951-0270
lwong@wongfleming.com

Laurel Pyke Malson (*pro hac vice*)
Aryeh S. Portnoy (*pro hac vice*)
Amanda Shafer Berman (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Ave., NW
Washington, DC 20004
(202) 624-2576
lmalson@crowell.com
aportnoy@crowell.com
aberman@crowell.com

Attorneys for The Trustees of Princeton University, a not-for-profit educational corp. of the State of New Jersey (incorrectly referenced in the Complaint as "Princeton University"), Michele Minter, Regan Hunt Crotty, Joyce Chen Shueh, Walter Wright, Cole M. Crittenden, Kathleen Deignan, W. Rochelle Calhoun, Jill S. Dolan, and Sarah-Jane Leslie

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOHN DOE,

Plaintiff,

v.

PRINCETON UNIVERSITY, et
al.,

Defendants.

Civil Action No. 3:19-cv-07853 BRM-TJB

**STIPULATION TO EXTEND
ANSWER DEADLINE AND
PROPOSED ORDER**

Stipulation to Extend Answer Deadline and Proposed Order

Defendant the Trustees of Princeton University¹ (“Princeton” or “the University”) and Plaintiff John Doe hereby stipulate to extend the time for Princeton to file its Answer to the Amended Complaint until March 14, 2023. The reason for this Stipulation are as follows:

1. On February 6, 2023, the Court denied Princeton’s Renewed Motion to Dismiss the Title IX Claims in the Amended Complaint (ECF No. 88). Under Fed. R. Civ. P. 12(a)(4)(A), Defendant therefore must answer the Amended Complaint by February 21, 2023.

2. Defendants must coordinate with the University in order to answer the allegations in the 250-paragraph Amended Complaint (ECF No. 33-1), which will take more than the time currently remaining under Rule 12(a)(4)(A). Additional time to answer the Amended Complaint is warranted for this reason.

For the foregoing reason, the parties hereby STIPULATE to extend the time to Answer the Amended Complaint until March 14, 2023.

¹ The only claim against the individual Defendants named in the Amended Complaint was dismissed in the Court’s December 16, 2020 Order granting in part and denying in part Plaintiffs’ Motion to Dismiss the State Law Claims. *See* ECF No. 55 (dismissing Count 7, the negligence claim against the individual Defendants).

Submitted by:

/s/ Linda Wong
Linda Wong, Esq.
WONG FLEMING, P.C.
821 Alexander Road, Suite 200
Princeton, NJ 08543-3663
Tel. (609) 951-9520
Fax (609) 951-0270
lwong@wongfleming.com

Laurel Pyke Malson, Esq. (*pro hac vice*)
Aryeh Portnoy, Esq. (*pro hac vice*)
Amanda Shafer Berman, Esq. (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004
Tel: (202) 624-2576
LMalson@crowell.com
APortnoy@crowell.com
ABerman@crowell.com
Attorneys for Defendants

/s/ Andrew T. Miltenberg (with permission)
Andrew T. Miltenberg, Esq.
Helen Setton, Esq.
363 Seventh Avenue, Fifth Floor
New York, New York 10001
T. (212) 736-4500
amiltenberg@nmlplaw.com
hsetton@nmlplaw.com
Attorneys for Plaintiff

IT IS SO ORDERED.

Entered this _____ day of February, 2023

Hon. Zahid N. Quraishi, District Judge